

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

<i>In re:</i>	§	
	§	CHAPTER 11
KrisJenn Ranch, LLC, et al.,	§	
	§	
<i>Debtor.</i>	§	CASE No. 20-50805

KrisJenn Ranch, LLC, et al.,	§	
	§	
<i>Plaintiffs,</i>	§	
	§	
v.	§	
	§	ADVERSARY No. 20-05027
DMA Properties, Inc., et al.,	§	
	§	
<i>Defendants.</i>	§	
	§	

**AMENDED NOTICE OF ORAL DEPOSITION IN AID OF
JUDGMENT OF LARRY WRIGHT**

To: Larry Wright, Plaintiff in the above-referenced case, and judgment-debtor, by and through his counsel, William Germany, GERMANY LAW, 1250 N.E. Loop 410, Suite 725, San Antonio, TX 78209, wgermany@germanylaw.com.

Please take notice that Defendants DMA Properties, Inc. and Frank Daniel Moore (collectively, “DMA”), and Longbranch Energy, LP (“Longbranch”) will take the oral and videotaped post-judgment deposition of Larry Wright in aid of the judgment issued against him in this case. The deposition is scheduled to begin at 9:00 AM on Wednesday, June 11, 2025. DMA and Longbranch will appear and take the deposition by videoconference (Zoom). The deponent shall remain in attendance until the deposition is completed, unless otherwise agreed. The deposition will be taken before a court reporter, notary public, or some other officer authorized by law to administer oaths.

You are further ordered and directed to bring and produce at that time and place, as fully as if a subpoena duces tecum were otherwise served upon you, all of the following:

1. A list of all assets belonging to you.
2. Your Tax Identification Number(s), if any.
3. A list of your current addresses, including any business addresses and/or operating addresses.
4. Any and all documents evidencing your direct or indirect ownership in Express H2O Pipeline and ROW, LLC ("Express H2O").
5. Any and all documents evidencing your relationship to Express H2O.
6. All income tax returns filed by You for the previous four (4) years.
7. All documents referred to in any way, directly or indirectly, in any and all income tax returns filed by you for the previous four (4) years.
8. All documents that constitute or refer in any way, directly or indirectly, to any and all books, records, or other memoranda of business or financial conduct, activities, status or income of Yours for the past four (4) years.
9. All documents that constitute or refer in any way, directly or indirectly, to any and all deeds, records, or other documents which relate to assets in Your name.
10. All documents that constitute or refer in any way, directly or indirectly, to any records of salaries, commissions, bonuses, income from employment, allowances, expenses, or any other sums of money paid to You or by You within the previous four (4) years.
11. All documents that contain or refer in any way, directly or indirectly, to the name(s) and address(es) of the person or persons who have custody of records of salaries, commissions, bonuses, allowances, expenses, or any other sums of money paid to or by You within the last four (4) years.
12. All documents referring in any way, directly or indirectly, to any items of personal property in which You own or claim any interest.
13. All documents, items, and things referring in any way, directly or indirectly, to any and all accounts (business or personal bank, checking, savings, credit union, or retirement accounts) in which You have an interest.
14. All documents referring in any way, directly or indirectly, to the name and address of persons or entities to whom You have given a financial statement in the last two (2) years.
15. All documents that constitute or refer in any way, directly or indirectly, to

financial statements prepared by You in the last four (4) years.

16. All documents containing or referring in any way, directly or indirectly, to the names or addresses of person who have served as Your bookkeepers or financial advisers during the last four (4) years.
17. All documents referring in any way, directly or indirectly, to each person or entity to whom You have paid, given, or conveyed any real or personal property of a value more than \$200.00 in the last four (4) years, not in the regular course of business.
18. All documents referring in any way, directly or indirectly, to any personal or real property which You have sold, given, paid, or otherwise conveyed during the last four (4) years.
19. All documents referring in any way, directly or indirectly, to any and all motorized vehicles (including automobiles, trucks, watercraft, aircraft, and motorcycles) in which You claim an interest.
20. All documents referring in any way, directly or indirectly, to any and all persons or entities who have appraised any real or personal property for You during the last two (2) years.
21. All documents that constitute or refer in any way, directly or indirectly, to any appraisal of any real or personal property prepared for You during the last two (2) years.
22. All documents that evidence or refer in any way, directly or indirectly, to the amount of money owed to You by any person or entity.
23. All documents referring in any way, directly or indirectly, to any legal cause of action, either real or anticipated, by or against You. 19. All documents referring in any way, directly or indirectly, to the anticipated amount of recovery in any legal cause of action, either real or anticipated, by You.
24. All documents referring in any way, directly or indirectly, to each person or entity who has served as Your bank during the last two (2) years.
25. All documents referring in any way, directly or indirectly, to any cash on hand for You as of the date of the deposition.
26. All documents referring in any way, directly or indirectly, to any and all cash in any account owned or claimed by You held or deposited with any bank or other financial institution(s).
27. All documents referring in any way, directly or indirectly, to any accounts payable owed by You.
28. All documents that constitute or refer in any way, directly or indirectly, to any accounts receivable owed to You.

29. All documents that constitute or refer in any way, directly or indirectly, to notes receivable held by You or in which You claim an interest.
30. All documents referring in any way, directly or indirectly, to shares of stock owned by You or in which You claim an interest.
31. All documents referring in any way, directly or indirectly, to bonds owned by the You or in which You claim an interest.
32. All documents referring in any way, directly or indirectly, to real estate that You own or in which You claim an interest (including homestead).
33. All documents referring in any way, directly or indirectly, to property that You claim as homestead property.
34. All documents referring in any way, directly or indirectly, to any and all businesses in which You are a partner, officer, or principal owner.
35. All documents referring in any way, directly or indirectly, to any interest You may have in any businesses, partnerships, corporations, or joint ventures.
36. All documents referring in any way, directly or indirectly, to any equipment that You own or in which You claim an interest.
37. All documents referring in any way, directly or indirectly, to mortgage(s) upon which You are liable.
38. All documents referring in any way, directly or indirectly, to accounts payable by You, including account name(s), original amount, person or entity to whom due, balance owing, payments, maturity and collateral.
39. All documents referring in any way, directly or indirectly, to accounts payable by You or in which You claim an interest.
40. All documents referring in any way, directly or indirectly, to any other unpaid taxes for which You are liable except for those already listed with regard to real estate.
41. All documents referring in any way, directly or indirectly, to any assets held in trust, in an estate, or in any other name or capacity in which You claim or have an interest.
42. All documents referring in any way, directly or indirectly, to any assets that were owned or claimed by Your spouse before marriage, acquired by Your spouse during marriage by gift or inheritance, or recovered for personal injuries sustained by Your spouse during marriage or received in any settlement or judgment pertaining to divorce.
43. All documents referring in any way, directly or indirectly, to assets, except real estate, that are securing any debt for which You are liable.

44. All documents referring in any way, directly or indirectly, to Your obligations to pay the leases, notes, or other debts of any other person or entity.
45. All documents referring in any way, directly or indirectly, to any unsatisfied judgments against You or for which You are liable.
46. All documents referring in any way, directly or indirectly, to any filing in bankruptcy by You or any assignment by You for the benefit of creditors.
47. All documents referring in any way, directly or indirectly, to any dividends payable to You or in which You claim an interest.
48. All documents referring in any way, directly or indirectly, to any interest payable to You or in which You claim an interest.
49. All documents referring in any way, directly or indirectly, to any royalties payable to You or in which You claim an interest.
50. All documents referring in any way, directly or indirectly, to any personal or business expense of Yours (management, rent, household, etc.).
51. All documents referring in any way, directly or indirectly, to any insurance payments You may have or any insurance payments due to You.
52. All documents referring in any way, directly or indirectly, to any other assets not already divulged by You pursuant to this document request.
53. All documents referring in any way, directly or indirectly, to any other liabilities not already divulged pursuant to this document request.
54. All documents referring in any way, directly or indirectly, to any outstanding contracts for which You are entitled to receive a commission, and/or upon which You claim a right to receive a commission, whether a partial commission or complete commission.
55. Any will executed but not revoked in writing by You.
56. All documents referring to any divorce of Yours within the last four (4) years.
57. All documents evidencing safety deposit boxes, lock boxes, and storage facilities of any kind to which You have access.
58. All check stubs, cancelled checks and bank statements for the previous two (2) years for accounts in which You claim an interest.
59. All documents evidencing any trusts and the assets contained therein for trusts of which You are a grantor, a beneficiary, or trustee.

Respectfully submitted,

/s/ Christopher S. Johns

Christopher S. Johns
State Bar No. 24044849
Michael Cotton
State Bar No. 24116229
COBB & JOHNS PLLC
13341 West U.S. Highway 290
Building 2
Austin, TX 78737
512-399-3150
chris@cobbjohns.com
michael@cobbjohns.com

/s/ Timothy Cleveland

Timothy Cleveland
State Bar No. 24055318
Austin H. Krist
State Bar No. 24106170
CLEVELAND KRIST PLLC
303 Camp Craft Road, Suite 325
Austin, Texas 78746
512-689-8698
tcleveland@clevelandkrist.com
akrist@clevelandkrist.com

*Attorneys for Longbranch Energy, DMA
Properties, and Frank Daniel Moore*

Natalie F. Wilson
State Bar No. 24076779
LANGLEY & BANACK
745 East Mulberry Avenue, Suite 700
San Antonio, Texas 78212
210-736-6600
210-735-6889 fax
nwilson@langleybanack.com
*Attorneys for DMA Properties and Frank
Daniel Moore*

Michael Black
BURNS & BLACK PLLC
750 Rittiman Road
San Antonio, TX 78209
mblack@burnsandblack.com

Jeffery Duke
JF DUKE AND ASSOCIATES
11819 Great Oaks Drive
College Station, TX 77494
jeff@jfduke.com

Attorneys for Longbranch Energy